

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA

☐ EEOC **560-2019-01033**

**Missouri Commission on Human Rights**

State or local agency, if any

Name (Indicate Mr., Ms., Mrs.)

**John N. Castellano III**

Home Phone No. (Incl Area Code)

**314-518-1655**

Date of Birth

**06/18/1973**

Street Address

**5253 Bonita**

City, State and Zip Code

**St. Louis, MO 63109**

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

**City of St. Louis/St. Louis Sheriff's Department**

No. Employees, Members

**15+**

Phone No. (Include Area Code)

**314-622-4131**

Street Address

**1114 Market St., Suite 112**

City, State and Zip Code

**St. Louis, MO 63101**

Name

**See Below**

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and Zip Code

DISCRIMINATION BASED ON (Check Appropriate Box(es).)

☒ RACE

☒ COLOR

☐ SEX

☐ RELIGION

☐ NATIONAL ORIGIN

☒ RETALIATION

☐ AGE

☐ DISABILITY

☐ OTHER (Specify below.)

Other:

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

**11/26/18**

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I have been an employee of the Sheriff's Department as a deputy since August 9, 1998. I am a Caucasian male. I put in for but was passed over for promotion to sergeant in April 2017 and August 2017. Both of these times, promotions went to African American deputies in the Sheriff's Department. On August 23, 2017, I filed a discrimination lawsuit related to the April 2017 promotion, after filing a Charge of Discrimination on June 12, 2017. I filed a Charge of Discrimination related to the August 2017 promotion on October 11, 2017. It is still pending before the EEOC at Charge No. 560-2018-00093.

On or about November 26, 2018, I learned that two more African American deputies in the Sheriff's Department were promoted. After the promotions were announced, I learned that only certain deputies were contacted to apply for this promotion opportunity, instead of opening the process up to every deputy that was qualified. I am qualified by length of service and training to be promoted to sergeant but was never told about the promotion opportunity to apply for it.

I want this charge filed with both EEOC and the State or Local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirement

I swear

The be  
SIGNA

SUBSC

(month, day, year)

and that it is true to

**EXHIBIT**

**3**

**Exhibit 26**

I declare under penalty of perjury that the above is true and correct.

**3-5-19**

Date

*John N. Castellano III*

Charging Party Signature

THIS DATE

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560-2019-01033

**Missouri Commission on Human Rights***State or local agency, if any*

THE PARTICULARS ARE (Continued from previous page):

I am more qualified by experience and/or training than the African American deputies who were promoted to sergeant. I continue to be discriminated against because of my race/color and to be retaliated against for filing 2 previous Charges of Discrimination and a discrimination lawsuit.

**Supervisors Discriminating Against Me:**

Vernon Betts, Sheriff

1114 Market St., Suite 112, St. Louis, MO 63101 314-622-4131

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ST. LOUIS DISTRICT  
2019 MAR 11 PM 12:54

I want this charge filed with both EEOC and the State or Local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to

The best of my knowledge, information and belief.  
SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

Date

Charging Party Signature